

March 8, 2000

Via E-Mail

Mr. Samuel McClerren
Illinois Commerce Commission
527 E. Capitol Avenue
Springfield, IL 62701

Dear Mr. McClerren:

Pursuant to the schedule established by the Illinois Commerce Commission (Commission) through its bench ruling of February 15, 2000, CoreComm Illinois, Inc., (CoreComm) submits its comments regarding SBC/Ameritech's revised OSS Plan of Record (POR) dated March 1, 2000.

The revised POR suffers from many of the same infirmities as the initial POR, but with considerably more information attached. CoreComm is encouraged that some of the issues that it raised in its comments directed at the 1-7-00 POR have been addressed in the revised POR. Nevertheless, several critical issues have still not received the level of attention necessary to make the revised POR a material benefit to the public interest in Illinois. If the Commission decides to accept the revised POR, it should, at a minimum, direct SBC/Ameritech to appropriately address the concerns raised by CoreComm and other CLECs within the collaborative process to follow.

SBC/Ameritech has attached a draft of the uniform 13-state change management process (CMP) currently under consideration in a separate collaborative process. The successful outcome of that collaborative process is a major factor in the successful implementation of the revised POR. SBC/Ameritech can commit to any number of changes in its OSS, but if CLECs do not have a practical opportunity to plan, build and

test their side of the interface to the changed OSS, then the entire POR is of little or no value to the public interest.

The uniform 13-state CMP, as it is currently drafted, contains a number of major flaws of which the Commission should be aware before accepting the revised POR. Chief among these flaws is SBC/Ameritech's proposal to support only the two most recent "dot release" versions of OSS software at any given time. Revised POR, Attachment A at 10. As SBC/Ameritech will, in all likelihood, issue a dot release once each quarter, a CLEC could potentially be required to develop two different major OBF release in a 12 month timeframe. At a minimum, SBC will be supporting only one major OBF release for a period longer than six months (assuming quarterly dot releases). It is highly important to smaller CLECs like CoreComm that if they are going to invest their relatively limited personnel time and resources in developing a interface with SBC/Ameritech's OSS, that interface must have a useful life-span of more than six months. Twelve months is a reasonable threshold. The Commission should require SBC/Ameritech to support two major software releases at any given time, rather than only supporting its two most recent dot releases.

Another problem with the current 13-state CMP draft is that it does not provide for adequate testing of OSS changes. In the revised POR, SBC/Ameritech states that the 13-state CMP will provide CLECs with the "opportunity" to test all changes in a test environment before Ameritech Illinois introduces those changes into the production environment. Revised POR at 8. This is an inadequate commitment. Before a CLEC is forced to implement a change in the way it provisions services to its retail customers, the CLEC must have a *meaningful* opportunity to test changes in SBC/Ameritech's OSS in a

production environment. In other words, a CLEC must have an opportunity to test the change to see if it will function in actual usage. Further, a production environment test should be provided for both the current release, as well as the prior release that SBC/Ameritech is currently supporting. CLECs also need a GUI test environment, which the current draft does not address. SBC/Ameritech has not yet committed to providing a meaningful opportunity for testing. In addition, changes stemming from regulatory mandates may be implemented without *any* opportunity for testing. Although CoreComm believes that this issue should be addressed in the POR, at a minimum the Commission should direct its third-party tester to give this issue particularly thorough scrutiny as SBC/Ameritech builds towards its FMO.

In Section 7.3 of the draft 13-state CMP (Attachment A at 21), the voting process relative to disputes needs to be modified to define “qualified CLEC” as those CLECs that currently use the OSS feature in question if the issues involves changes to existing processes.

CoreComm has raised, and continues to raise, these and other issues in the CMP collaborative process, but the outcome of that process is as yet undetermined. To the extent that the uniform 13-state CMP is incomplete, the revised POR is also incomplete.

In its comments concerning the 1-7-'00 POR, CoreComm criticized the absence of any discussion concerning 3d party testing. SBC/Ameritech does provide a minimal outline of some basic 3d party testing principles in the revised POR, but the level of detail in its discussion is glaringly vague in light of the relatively detailed proposals being circulated in the other SBC/Ameritech states. For instance, it is alarming that no mention is made of CLEC participation in the 3d party testing process. Just as with the change

management process discussed above, the POR is just a collection of promises without a meaningful 3rd party test to verify that the promises made become promises kept. The POR should contain at least a basic proposal for a 3d party test that can be used for the basis of discussions in the collaborative process to follow. The revised POR contains no such proposal.

The revised POR still contains no mention of improvements to SBC/Ameritech's OSS for hot cuts. It is inconceivable that SBC/Ameritech would contemplate pursuing 271 authority without addressing this subject. The ability to provision loop orders for assumed accounts at commercial volumes is critical for CLECs. This subject is much too important to go un-addressed in the POR. The revised POR is accordingly incomplete.

SBC/Ameritech has added language to the revised POR reiterating its commitment to implementing systems that conform to industry standards. This commitment is laudable. Unfortunately, the issue of standards is not as straightforward as it may seem. The standards issue has two components: a features component (business functions) and an data systems component (IS functions).

One of the main purposes of industry standards is to allow CLECs to build interfaces with different ILECs without having to build from scratch in each instance. The task of building to each ILEC in a substantially different manner would present an insurmountable barrier to entry for medium small-sized CLECs. CLECs must have access to OSS systems built to industry standards so that they do not have to "reinvent the wheel" each time they build an interface with an ILEC. However, access to OSS features are the ultimate goal for CLECs. OSS systems built to industry standards without the features that the particular standard is designed to support is of little value to CLECs.

Conversely, if an ILEC already offers OSS functionalities that are non-standard, but the current standard does not support that non-standard functionality, CLECs do not want OSS features removed simply for the sake of moving towards an industry-standard IS if there is no corresponding improvement in functionality. Business issues should drive the IS issues, not the other way around.

SBC/Ameritech currently offers certain pre-ordering functionalities that are not supported by LSOG 4. CoreComm does not want to lose those functionalities for the sake of moving to LSOG 4 unless LSOG 4 is going to provide benefits that outweigh the loss of functionality. SBC/Ameritech's implementation of LSOG 4 is limited to field name changes, field length changes, mapping changes and transaction messaging. CLECs are not getting any OBF-functionality defined between version 7 and LSOG 4, only the EDI upgrades. For example, SBC/Ameritech should be providing the complex business product functionalities that LSOG 4 supports, such as the centrex feature. CoreComm does not want to have to change its OSS twice, once for LSOG 4 and then again for the March 2001 release, unless there are significant gains in functionality with each revision.

The movement from a non-standard OSS environment to a standard-but-evolving environment requires a certain degree of flexibility in the implementation of OSS changes. An effective change management process will address many of the issues arising from this evolution. However, as a general matter, SBC/Ameritech should commit to provide "agreed-upon" implementation schedules for standards, recognizing that there may be instances where deviation from the standard is warranted. Flexibility is critical to viable OSS implementation.

Concerning additional functionalities, the Commission should require SBC/Ameritech to commit to provide DSL-capable line counts by central office in its POR. Thus far in the advanced services/xDSL collaborative, SBC/Ameritech has argued that this information is a “business issue,” rather than a pre-ordering functionality. For there to be any chance of OSS parity for xDSL provisioning, CLECs must have access to the same outside plant information as SBC/Ameritech in the same format and with the same access timelines.

Another functionality that is not addressed by the revised POR is the ordering of directory listings. Directory listings are a fundamental aspect of the provisioning process. It is unreasonable that CLECs like CoreComm must order a line via EDI from AIIS and then have to fax a request for a directory listing to AADS only after CoreComm has received a FOC and a service order number from AIIS on a EDI 850 purchase order. This again is an issue that the Commission should provide specific instruction to the 3rd party tester to closely examine if SBC/Ameritech does not directly address it in its POR.

In the Ohio collaborative process, comments were circulated by interested CLECs concerning the pre-ordering functions that SBC/Ameritech will be making available to CLECs on April 3, 2000. As these OSS functionalities are also a part of the Illinois POR, CoreComm is attaching its comments regarding these pre-ordering functionalities hereto as “Appendix A.”

In its comments concerning the 1-7-'00 POR, CoreComm raised a number of paragraph-specific issues. SBC/Ameritech has addressed some, but not many of those issues. CoreComm will not burden the Commission with a total recapitulation of those issues in these comments. To the extent that the issues previously raised by CoreComm

have not been addressed by SBC/Ameritech in the revised POR or elsewhere, CoreComm believes that the revised POR is incomplete. CoreComm intends to pursue these issues in the collaborative to follow. If the Commission decides to accept the revised POR, CoreComm respectfully requests that the Commission reiterate to SBC/Ameritech that the POR represents a starting point for the collaborative process to follow and that the point of the collaborative process is to address the issues and concerns of the CLEC community and to reach an agreement with that community concerning SBC/Ameritech's planned improvements to its OSS in Illinois.

Respectfully Submitted,

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**Comments of CoreComm concerning the Pre-Ordering Functionality Release
Announcement made pursuant to Section IV.A. of the Ohio OSS Plan of Record.**

The documentation released provides for three new pre-ordering capabilities to be released prior to April 3, 2000. They are:

- CFA Inquiry and Response
- Feature Availability Inquiry and Response
- NC/NCI Inquiry and Response

CoreComm understand that these transactions do not conform to the OBF standard. Where indicated in this document CoreComm is willing to utilize the non-standard implementation until such time the OBF and TCIF committees create a standard practice which cares for the information exchange that accommodates these requirements.

CFA Inquiry / Response transactions:

Business Requirement Concerns:

This inquiry will provide necessary information. However, this inquiry would be far more useful to CoreComm if it had the capability of requesting status on all circuits associated to the tie cable, *i.e.*, provide status of all circuit IDs associated to the tie cable when the query request contains the Facility Designation, the Facility Type, the Terminating Location A CLLI and the Terminating Location Z CLLI.

- CoreComm requests that inquiries on multiple pairs within one tie cable, up to and including the 0-99 pair range on a DS02 request.
- CoreComm also requests that the NC/NCI and Sec NCI codes for that CFA be returned as part of the CFA response transaction.

Technical concerns:

1. The CFA data elements, as broken down on the Connecting Facility Assignment Inquiry Matrix, do not match up to the ASR ordering rules, but do match to the EDI Unbundled Loop Ordering Matrix.

2. It is assumed that all data elements are left-justified in their EDI usage and per the 1-31-00 conf. call, no space filling is required.

Appendix A

3. The CHANNEL element on the Inquiry matrix shows 48 / AN however the Response matrix shows 5 / AN.
4. It is assumed that the data element CHANNEL should be 5 / AN on the Inquiry matrix.
5. The N101 qualifiers need to be defined for LOCA and LOCZ on the Inquiry matrix.
6. The D/T Sent needs the date format defined.
7. Need to clarify if a Dummy PO1 should be sent with the Inquiry. The PO1 is normally an X12 mandatory segment and it may cause translation problems if the PO1 is not present.
8. The Connecting Facility Assignment Response matrix shows the use of the CM qualifier twice. Once for data element CKRCFA and once for CKR. When returning a CFA why not return the same data elements as broken down on the Inquiry? If this is not possible than the CFA does normally show in EDI as a PID segment.
9. The STATUS data element defines a PID usage. The PID03 value is not defined on the matrix but is defined as TI in the X12 EDI implementation guide. Please confirm the use of PID03.
10. The ordering rules for CHANNEL describe the provision for up to 28 channels to be returned. Will multiple responses be provided in the case where the inquiry requested a channel range greater than 28 channels?
11. The ERRCODE data element utilizes a PID segment which shows the use of PID03 as TI. If these error codes are Ameritech defined the X12 standards call for the PID03 to be AS.
12. The valid error code list needs to be provided by Ameritech.

NC/NCI Inquiry / Response transactions:

CoreComm does not perceive any value in this functionality. The provision made by this set of transactions merely automates the current "list" of valid NC, NCI and Sec NCI codes that are already available to the CLEC community.

CoreComm instead requires the ability to provide either a CLLI or a Circuit ID and, in return, receive a response of the valid NC, NCI and Sec NCI combinations.

Appendix A

In response to the Feature Availability Inquiry / Response transactions:

CoreComm does not perceive any value to utilizing this functionality. The provision made by this set of transactions merely automates the current use of the data provided on the monthly CDROM. CoreComm prefers to continue utilizing the monthly CDROM.

CoreComm requests that this functionality be enhanced to include information to detail the following:

- All features associated to a requested class of service
- All conflict features associated to the available features
- All feature dependencies
- All feature activation and discontinued dates.

CoreComm further requests that upon use of the pre-order service address validation the response be expanded to include the features available to that service address.